

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Zijad Balic

Case: 2:22-mj-30185
Assigned To : Unassigned
Assign. Date : 4/15/2022
CMP: USA v BALIC (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 13, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841 (a)(1)	Possession with intent to distribute a controlled substance
18 U.S.C. § 924(c)	Use of a firearm in furtherance of a drug trafficking offense

This criminal complaint is based on these facts:
See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

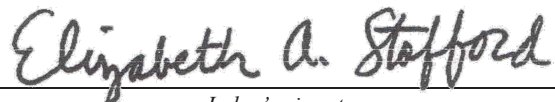
Date: April 15, 2022

City and state: Detroit, MI



Complainant's signature

Task Force Officer Brian Shock, DEA
Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Brian Shock, being first duly sworn, depose and state follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly sworn Task Force Officer (TFO) of the United States Drug Enforcement Administration (DEA) assigned to the Detroit Field Division, Eastern District of Michigan. As such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), who is empowered by law to conduct investigations of, to make requests for warrants and to make arrests for offenses enumerated in 18 U.S.C. § 2516(1). I have been a sworn Michigan law enforcement officer for approximately 28 years, am currently a Lieutenant of the Roseville Police Department, and have been employed with the Roseville Police Department for 23 years. Prior to this, I was employed as an officer by the City of Detroit Police Department for approximately 5 years. I am a sworn DEA TFO since March of 2020 and prior to that I was assigned to Roseville Police Department Narcotics Section for 10 years. I have received specialized training in drug trafficking, money laundering, diversion of controlled substances, and investigating drug related crimes, from the Detroit Metropolitan Police Academy, the Macomb County Community College Criminal Justice Institute, the Oakland County Criminal Justice Institute, the Michigan State Police as well as the DEA. During my career, I have performed

undercover assignments portraying roles of both purchaser and dealer of narcotics. Currently, I am assigned to the DEA Financial Investigations Team (FIT) and use all my prior experience and training to investigate any drug trafficking activity involving a money laundering component. I have also participated in multiple Title III investigations involving drug trafficking.

2. I make this affidavit based on personal knowledge derived from my participation in this investigation and information from oral and written reports about this investigation and others that I have received from state and federal law enforcement officers. The information outlined below was provided for the limited purpose of establishing probable cause and does not contain all details or facts of which I am aware relating to this investigation.

3. I am requesting an arrest warrant based on probable cause that ZIJAD BALIC, date of birth XX/XX/1986, has violated 21 U.S.C. §§ 841(a)(1) (possession with the intent to distribute a controlled substance) and 18 U.S.C. § 924(c) (use of a firearm in furtherance of a drug trafficking offense).

PROBABLE CAUSE

4. Zijad BALIC is the owner or operator of a logistics company named Northwest Transportation Inc. According to State of Michigan corporation records, BALIC is the registered agent and sole corporate officer of Northwest

Transportation Inc. The registered address for the company is 46820 Hayes Road, Macomb Township, Michigan, which appears to be an office or storefront.

5. On April 13, 2022, agent executed a federal search warrant at 46820 Hayes Road, where agents found 1 inch by 1-inch plastic baggies, which can be used to repackage drugs for distribution, and a bottle of acetone in the kitchenette area. I know from training and experience that acetone is used to repackage cocaine into bricks because it will increase the strength of the brick.

6. Agents also found a firearm, an LWRC model SMG-45 .45 caliber pistol, similar to the one depicted below, in a utility room:



7. BALIC was at his home April 13, 2022, during the search. BALIC was Mirandized and told agents that no one goes to 46820 Hayes Road except him. BALIC's spouse told agents that only she and BALIC access that location.

8. Northwest Transportation Inc. also rents or leases space at 11177 East 8 Mile Road, Warren, Michigan, which is a two-story commercial office and warehouse building with a shipping yard. The yard is approximately 27 acres and has portions of it divided or fenced off to lessees.

9. Agents executed another federal search warrant at 11177 East 8 Mile Road. On that property, the northeast portion of the lot has been rented to Northwest Transportation Inc. and that portion is fenced off with gate that requires a key code for entry. There is a sign which reads “Northwest Transportation” and there are several trailers marked with the company name inside the enclosed area, many of which are registered to the company at the office address, 46820 Hayes Road.

10. Within the enclosed area, there is a small office or shed, less than 100 square feet, marked Northwest Transport Inc. with the company phone number and website on the door. The shed was locked and agents had to force entry. Inside the Northwest Transportation shed, agents found approximately half a kilogram of a white powdery substance that is consistent in appearance to cocaine. The suspected cocaine was in a small locked refrigerator, and agents found the key hidden inside a Keurig coffee machine where a K-cup would go. The suspected cocaine was packaged into approximately 5 plastic baggies, consistent with repackaging drugs for distribution. On a shelf next to the refrigerator, agents also found a Sig Sauer P-

320 pistol registered in the State of Michigan to BALIC and body armor. There was also a laptop bag that contained a business card in BALIC's name. Agents also found a scale, small size plastic baggies (1-inch by 1-inch), US currency, roughly 100 pills in each of 6 baggies that appear to be consistent with amphetamines, a Schedule II controlled substance, and several pounds of marijuana. At BALIC's home, agents executing a federal search warrant found placards that read "POLICE" of the kind that can be attached to the body armor found in the truck yard office.

11. Near the office shed, there was a truck tractor registered to BALIC and a drug dog alerted on it for the presence of a drug odor. A Dodge Challenger registered to BALIC was also parked next to the drug. A drug dog also indicated to the presence of drug odor emanating from the Challenger, and inside agents found a Springfield XPS 9mm pistol.

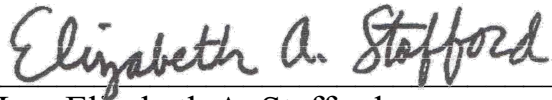
CONCLUSION

12. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that on or about April 13, 2022, ZILAJ BALIC possessed with the intent to distribute a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), and used a firearm in furtherance of that drug trafficking offense, in violation of 18 U.S.C. § 924(c).



Brian Shock
Task Force Officer, DEA

Sworn to before me and signed in my presence
And/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge